

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ALVIN GREENBERG, MICHAEL
STEINBERG, and CHRISTINA KING, on
behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware corporation,
Defendant.

No. 2:21-cv-00898-RSL

**STIPULATED MOTION AND
ORDER SETTING
PROCESS FOR SEALING
CONFIDENTIAL MATERIALS**

1 The Parties and their respective counsel stipulate and request that the Court order as
2 follows:

3 1. On May 23, 2025, Plaintiffs filed under provisional seal a Cross-Motion to Compel
4 Withheld Data (Dkt. 154) with a Motion to Provisionally Seal Another Party's Materials (Dkt. 153).
5 Plaintiffs attached to and discussed in their Cross-Motion certain documents Amazon has
6 designated Confidential under the Protective Order in this case. *See* Dkts. 154 and 155.

7 2. Amazon intends to request for the Court to maintain sealing for materials submitted
8 by Plaintiffs, under the procedure set forth in LCR 5(g)(1)(A).

9 3. The Parties anticipate that further briefing on Plaintiffs' Cross-Motion may likewise
10 reference Amazon's confidential materials.

11 4. In the interest of efficiency and judicial economy, the Parties stipulate and jointly
12 propose that Amazon submit a single brief to support the sealing of any materials for which it
13 intends to seek continued sealing in connection with the briefing on Plaintiffs' Cross-Motion,
14 rather than separate sealing papers for each brief filed.

15 5. Plaintiffs' Motion to Provisionally Seal (Dkt. 153) shall be deemed to apply to any
16 of Amazon's confidential materials filed in connection with the briefing on Plaintiffs' Cross-
17 Motion. Pursuant to LCR 5(g)(2), Plaintiffs and Amazon will provisionally file under seal those
18 portions of any briefing, declarations, exhibits, and all other evidence which may contain material
19 designated Confidential or Highly Confidential.

20 6. Following the completion of briefing, the Parties will meet and confer regarding
21 sealing. Amazon's response regarding sealing, and any proposed redactions, will be due two weeks
22 after briefing on Plaintiffs' Cross-Motion is completed.

1 IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.

2
3 DATED this 5th day of June 2025.

Respectfully submitted,

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ORDER

Pursuant to the Parties' Stipulation, IT IS SO ORDERED. Amazon's consolidated response shall clearly identify each docket entry to which it pertains.

Dated: June 6, 2025



Robert S. Lasnik
UNITED STATES DISTRICT JUDGE